Statement of Basis of the Federal Operating Permit

Georgia-Pacific Chemicals LLC

Site Name: Lufkin Chemical Plant Physical Location: 1429 E Lufkin Ave Nearest City: Lufkin County: Angelina

> Permit Number: O1140 Project Type: Minor Revision

Standard Industrial Classification (SIC) Code: 2821 SIC Name: Plastics Materials

This Statement of Basis sets forth the legal and factual basis for the draft changes to the permit conditions resulting from the minor revision project in accordance with 30 TAC §122.201(a)(4). The applicant has submitted an application for a minor permit revision per §§ 122.215-217. This document may include the following information:

A description of the facility/area process description;

A description of the revision project;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements:

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected;

A compliance status; and

A list of available unit attribute forms.

Prepared on: April 25, 2017

Operating Permit Basis of Determination

Description of Revisions

- Incorporated an amendment into NSR permit 4603, which authorized a change to the control technique associated with Methanol Storage Tank TK-MEOH-1. The NSR amendment was issued complete on March 24, 2017.
- Updated MACT G applicable requirements for tank TK-MEOH-1.

Permit Area Process Description

The Georgia-Pacific Chemicals, LLC (GPC), Lufkin manufacturing facility consists of equipment for three distinct processes: formaldehyde production, resin production, and oil field products.

Water-based formaldehyde (HCHO) is produced by converting methanol in a catalytic converter. Because this process is exothermic, a series of process equipment is used to keep the process at a safe and efficient operating temperature. The formaldehyde product is stored and then either shipped or used in the resin production part of the site. An absorber and a catalytic oxidizer control the VOC and HAP emissions from this process.

In the resin process at the site, urea- and phenol-formaldehyde (PF) resins are produced by combining several raw materials in five (5) batch "kettles." As the raw materials are mixed in these kettles and produce resins, another exothermic reaction takes place, and the temperature is controlled for optimum, safe operations. The final product is cooled, forming a solid at ambient temperature. The reaction is normally carried out under the conditions of vacuum. Emissions from the vacuum pump for each kettle are vented to a thermal oxidizer. The solidified resin is sold as a flake or pastille. Emissions from this product line are characterized as particulate matter.

GPC Lufkin manufactures soaps/ emulsifier products (OFP) for the oil field industry. The process is controlled by a thermal oxidizer.

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

| Major Pollutants HAPS |
|-----------------------|
|-----------------------|

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - o New Source Review Authorization Requirements
 - o Compliance Requirements
 - o Protection of Stratosphere Ozone
 - o Permit Location
 - o Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - o Compliance Plan
 - Alternative Requirements
- Appendix A
 - o Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the

requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995,

that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

| Regulatory Program | Applicability (Yes/No) |
|--|---------------------------|
| Prevention of Significant Deterioration (PSD) | No |
| Nonattainment New Source Review (NNSR) | No |
| Minor NSR | Yes |
| 40 CFR Part 60 - New Source Performance Standards | Yes |
| 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs) | Yes |
| 40 CFR Part 63 - NESHAPs for Source Categories | Yes |
| Title IV (Acid Rain) of the Clean Air Act (CAA) | No |
| Title V (Federal Operating Permits) of the CAA | Yes |
| Title VI (Stratospheric Ozone Protection) of the CAA | Yes |

| CSAPR (Cross-State Air Pollution Rule) | No |
|--|----|
|--|----|

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.

- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|-----------|---------------------------------|--------------------|--|---------------------------------|
| SG | 40 CFR Part 63, Subpart ZZZZ | 63ZZZZ | Brake HP = Stationary RICE with a brake HP greater than 500 HP. | |
| | Subpart ZZZZ | | Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. | |
| | | | Stationary RICE Type = Compression ignition engine | |
| B-1 | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | | Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters) | |
| GRP1PF | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = On or before June 11, 1973 | |
| GRP1PFA | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 | |
| | | | Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less | |
| GRP1UF | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 | |
| | | | Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less | |
| GRP2PF | 40 CFR Part 60, | | Product Stored = Volatile organic liquid | |
| | Subpart Kb | | Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) | |
| | | | Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia | |
| GRP2PFA | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | | Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters) | |
| GRP2PFB | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | | Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters) | |
| GRP2UF | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | - Storage Capacity | Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) | |
| | | | Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia | |
| GRP-B | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | ubpart Kb | Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) | |
| | | | Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia | |
| GRPFOR2TK | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 | |
| | | | Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|-------------|-------------------------------|--------------|---|---------------------------------|
| | | | | |
| GRPFOR2TK | 40 CFR Part 63, Subpart G | 63G | MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb. | |
| GRPFORTK | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia | |
| GRPFORTK | 40 CFR Part 63, Subpart G | 63G | MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb. | |
| MT-1/TK-W-A | 40 CFR Part 60, Subpart Ka | 60Ka | Product Stored = Stored product other than a petroleum liquid | |
| MT-1/TK-W-A | 40 CFR Part 63, Subpart G | 63G | MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb. | |
| RWSUMP | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less | |
| TK-25 | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = On or before June 11, 1973 | |
| TK-4 | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less | |
| TK-9 | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less | |
| TK-AC-1 | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters) | |
| TK-DETA | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters) | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|---------|-------------------------------|--------------|---|---------------------------------|
| TK-F-10 | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia | |
| TK-F-10 | 40 CFR Part 63, Subpart G | 63G | MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb. | |
| TK-F-6 | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less | |
| TK-F-6 | 40 CFR Part 63, Subpart G | 63G | MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb. | |
| TK-F-8 | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia | |
| TK-F-8 | 40 CFR Part 63, Subpart G | 63G | MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb. | |
| TK-F-9 | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia | |
| TK-F-9 | 40 CFR Part 63, Subpart G | 63G | MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb. | |
| TK-LS | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|-----------|------------------------------|--------------|--|---------------------------------|
| TK-LS | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | | Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) | |
| | | | Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia | |
| TK-MEOH-1 | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 | |
| | | | Storage Capacity = Capacity is greater than 65,000 gallons (246,052 liters) | |
| | | | Product Stored = Stored product other than petroleum liquid (as defined in 40 CFR Part 60, Subpart K) | |
| TK-MEOH-1 | 40 CFR Part 63, Subpart G | 63G | MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G). | |
| | | | Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G | |
| | | | NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. | |
| | | | Hard Piping = The closed vent system is constructed of hard piping. | |
| | | | Bypass Lines = Closed vent system has no by-pass lines. | |
| | | | Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa) | |
| | | | Emission Control Type = Emissions routed to a process | |
| TK-MMA | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | | Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters) | |
| TK-NOV-E | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | | Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters) | |
| TK-NOV-N | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | | Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters) | |
| TK-NOV-S | 40 CFR Part 60, Subpart K | 60K | Construction/Modification Date = On or before June 11, 1973 | |
| TK-RM-12 | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | | Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) | |
| | | | Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia | |
| TK-RM-13 | 40 CFR Part 60, | 60Kb | Product Stored = Volatile organic liquid | |
| | Subpart Kb | | Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) | |
| | | | Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|-----------------|---|--------------|--|---------------------------------|
| TK-RM-4 | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Stored product other than volatile organic liquid or petroleum liquid | |
| TK-RM-5 | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters) | |
| TK-SG | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters) | |
| TK-TOFA | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia | |
| TK-T-T TANK | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters) | |
| TK-TW-1 | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters) | |
| TK-W-C | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Stored product other than volatile organic liquid or petroleum liquid | |
| TK-W-D | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Stored product other than volatile organic liquid or petroleum liquid | |
| TK-WW-1 | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters) | |
| WTB | 40 CFR Part 60, Subpart Kb | 60Kb | Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters) | |
| DIESEL- LOAD | 30 TAC Chapter 115, Loading and Unloading of VOC | R5211 | Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Product Transferred = Volatile organic compounds other than gasoline. | |
| LOAD1 | 30 TAC Chapter 115, Loading and Unloading of VOC | R5211 | Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than gasoline. Transfer Type = Only loading. | |
| LOAD2 | 30 TAC Chapter 115, Loading and Unloading of VOC | R5211 | Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|---------|---------------------------------|--|---|---|
| | | | Product Transferred = Volatile organic compounds other than gasoline. | |
| | | | Transfer Type = Only loading. | |
| LOAD3 | 30 TAC Chapter 115, Loading | R5211 | Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. | |
| | and Unloading of VOC | | Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. | |
| | | | Product Transferred = Volatile organic compounds other than gasoline. | |
| | | | Transfer Type = Only loading. | |
| LOAD4 | 30 TAC Chapter 115, Loading | R5211 | Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. | |
| | and Unloading of VOC | | Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. | |
| | | | Product Transferred = Volatile organic compounds other than gasoline. | |
| | | | Transfer Type = Only loading. | |
| LOAD4 | 40 CFR Part 63, Subpart G | 63G | Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111). | |
| | | Subpart G | | Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, Subpart BB. |
| LOAD5 | 30 TAC Chapter 115, Loading | gasoline bulk plant, motor vehicle fuel dispensing facility or marine and Unloading of VOC Alternate Control Requirement (ACR) = No alternate control require being utilized. | Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. | |
| | and Unloading of VOC | | Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. | |
| | | | Product Transferred = Volatile organic compounds other than gasoline. | |
| | | | Transfer Type = Only loading. | |
| LOAD5 | 40 CFR Part 63, Subpart FFFF | 63FFFF | Emission Standard = None of the above standards apply. | |
| LOAD6 | 30 TAC Chapter 115, Loading | R5211 | Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. | |
| | and Unloading of VOC | | Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. | |
| | | | Product Transferred = Volatile organic compounds other than gasoline. | |
| | | | Transfer Type = Only loading. | |
| LOAD7 | 30 TAC Chapter 115, Loading | R5211 | Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. | |
| | and Unloading of VOC | | Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. | |
| | | | Product Transferred = Volatile organic compounds other than gasoline. | |
| | | | Transfer Type = Only loading. | |
| R-LOAD | 40 CFR Part 63, | 63G | Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111). | |
| | Subpart G | | Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|---------|-------------------------------|--|--|---------------------------------|
| | | | Subpart BB. | |
| BOIL-1 | 40 CFR Part 60, | 60D | Construction/Modification Date = After September 18, 1978. | |
| | Subpart D | | Covered Under Subpart Da = The steam generating unit is not covered under 40 CFR Part 60, Subpart Da. | |
| | | | D-Series Fuel Type #2 = Gaseous fossil fuel. | |
| | | | Changes to Existing Affected Facility = No change has been made to the existing fossil fuel-fired steam generating unit. | |
| | | | Heat Input Rate = Heat input rate is less than or equal to 250 MMBtu/hr (73 MW). | |
| | | | Flue Gas Desulfurization = The unit does not utilize a flue gas desulfurization device. | |
| | | | Cyclone-Fired Unit = The unit is not a cyclone-fired unit. | |
| | | | NOx Monitoring Type = It was not demonstrated during the performance test that emissions of NO_x are less than 70% of applicable standards in 40 CFR § 60.44. | |
| BOIL-1 | 40 CFR Part 60, Subpart Da | 60Da | Construction/Modification Date = AFTER SEPTEMBER 18, 1978 AND ON OR BEFORE JULY 9, 1997 | |
| | | | Heat Input of Fossil Fuel = Heat input of fossil fuel is less than or equal to 250 MMBtu/hr (73 MW). | |
| BOIL-1 | 40 CFR Part 60, Subpart Db | 60Db | Construction/Modification Date = Constructed or reconstructed after February 28, 2005. | |
| | | | Heat Input Capacity = Heat input capacity is less than or equal to 100 MMBtu/hr (29 MW). | |
| BOIL-1 | 40 CFR Part 60, | PM Monitoring Type = No particulate monitoring. Maximum Design Heat Input Capacity = | Construction/Modification Date = After February 28, 2005. | |
| | Subpart Dc | | PM Monitoring Type = No particulate monitoring. | |
| | | | Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW). | |
| | | | SO2 Inlet Monitoring Type = No SO ₂ monitoring. | |
| | | | Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB. | |
| | | | SO2 Outlet Monitoring Type = No SO ₂ monitoring. | |
| | | | Heat Input Capacity = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW). | |
| | | | Technology Type = None. | |
| | | | D-Series Fuel Type = Natural gas. | |
| | | | 47C-Option = COMS exemption § 60.47c(e) for a facility not using post-combustion technology (except a wet scrubber), burns only gaseous fuels or fuel oils that contain no more tha 0.5 % by weight sulfur, and emissions of CO are 0.15 lb/MMBtu average. | |
| | | | ACF Option - SO2 = Other ACF or no ACF. | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|---------|----------------------------------|--------------|--|--|
| | | | ACF Option - PM = Other ACF or no ACF. | |
| | | | 30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner. | |
| BOIL-1 | 40 CFR Part 63, Subpart DDDDD | 63DDDDD | Construction/Reconstruction Date = Construction or reconstruction began on or before June 4, 2010. | The rule citations were determined from an analysis of the rule text and the basis of determination. |
| BOIL-2 | 40 CFR Part 60, | 60D | Construction/Modification Date = On or before August 17, 1971. | |
| | Subpart D | | D-Series Fuel Type #2 = Gaseous fossil fuel. | |
| | | | Flue Gas Desulfurization = The unit does not utilize a flue gas desulfurization device. | |
| | | | Cyclone-Fired Unit = The unit is not a cyclone-fired unit. | |
| | | | NOx Monitoring Type = It was not demonstrated during the performance test that emissions of NO $_{\rm x}$ are less than 70% of applicable standards in 40 CFR § 60.44. | |
| BOIL-2 | 40 CFR Part 60, Subpart Da | 60Da | Construction/Modification Date = ON/BEFORE SEPTEMBER 18, 1978 | |
| BOIL-2 | 40 CFR Part 60, Subpart Db | 60Db | Construction/Modification Date = On or before June 19, 1984. | |
| BOIL-2 | 40 CFR Part 60, Subpart Dc | 60Dc | Construction/Modification Date = On or before June 9, 1989. | |
| BOIL-2 | 40 CFR Part 63, Subpart DDDDD | 63DDDDD | Construction/Reconstruction Date = Construction or reconstruction began on or before June 4, 2010. | The rule citations were determined from an analysis of the rule text and the basis of determination. |
| F-DOW | 40 CFR Part 60, Subpart VV | 60 VV | Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489. | |
| | | | Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2). | |
| | | | Construction/Modification Date = On or before January 5, 1981. | |
| F-DOW | 40 CFR Part 63, Subpart H | 63 H | EQUIPMENT TYPE = FUGITIVE UNIT DOES NOT CONTAIN EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE | |
| F-FORM | 40 CFR Part 60, Subpart VV | 60 VV | Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489. | |
| | | | Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR \S 60.480(a)(2). | |
| | | | Construction/Modification Date = On or before January 5, 1981. | |
| F-FORM | 40 CFR Part 63, | 63H | ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|---------|------------|--------------|---|---------------------------------|
| | Subpart H | | ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT | |
| | | | BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE | |
| | | | EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE | |
| | | | GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT | |
| | | | LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT | |
| | | | HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT PRESENT | |
| | | | HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT | |
| | | | HEAVY LIQUID SERVICE (PUMPS) = COMPONENT PRESENT | |
| | | | NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES | |
| | | | UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED- VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT | |
| | | | ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT | |
| | | | DIFFICULT TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED- VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS DIFFICULT TO INSPECT | |
| | | | GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT | |
| | | | QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS | |
| | | | VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE | |
| | | | ANY (COMPRESSORS) = COMPONENT NOT PRESENT | |
| | | | HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS = COMPONENT PRESENT | |
| | | | HEAVY LIQUID SERVICE (VALVES) = COMPONENT PRESENT | |
| | | | LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR | |
| | | | ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT | |
| | | | GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT | |
| | | | QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES | |
| | | | AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL) | |
| | | | GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT | |
| | | | HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** | |
|---------|---|--------------|--|---|--|
| | | | COMPONENT NOT PRESENT | | |
| | | | LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT | | |
| | | | HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT | | |
| | | | HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT | | |
| | | | ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT | | |
| | | | HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT | | |
| F-RESIN | 40 CFR Part 60, Subpart VV | 60 VV | Produces Chemicals = The fugitive unit is not part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489. | | |
| NCT | 40 CFR Part 63, Subpart Q | 63Q | Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994. | | |
| SCT | 40 CFR Part 63, Subpart Q | 63Q | Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994. | | |
| BOIL-2 | 30 TAC Chapter 111, Visible Emissions | 1, Visible | Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113. | | |
| | | | Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit. | | |
| | | | Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of $\S 111.111(a)(1)(D)$, or the vent stream does not qualify for the exemption in $\S 111.111(a)(3)$. | | |
| | | | Construction Date = On or before January 31, 1972 | | |
| | | | Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute. | | |
| CONVERT | 40 CFR Part 63, Subpart G | 63G-ABS | Alternate Monitoring Parameters = The EPA Administrator has approved alternate monitoring parameters. | | |
| | | | | Control Device = Absorber used as a recapture device. | |
| | | | Overlap = Title 40 CFR Part 63, Subpart G only | | |
| | | | Group $1 =$ The process vent meets the definition of a Group 1 process vent. | | |
| | | | Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118. | | |
| | | | Halogenated = Vent stream is not halogenated. | | |
| | | | By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device. | | |
| | | | Flow Indicator = By-pass line valve is secured with a car-seal or lock-and-key type configuration. | | |
| | | | Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods | | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|-----------|--------------------------------|--------------|--|---------------------------------|
| | | | specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance. | |
| CONVERT | 40 CFR Part 63, Subpart G | 63G-CATINC | Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used. | |
| | | | Control Device = Catalytic incinerator. | |
| | | | Overlap = Title 40 CFR Part 63, Subpart G only | |
| | | | Group $1 =$ The process vent meets the definition of a Group 1 process vent. | |
| | | | Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118. | |
| | | | Halogenated = Vent stream is not halogenated. | |
| | | | Regulation = Owners or operator is required to comply only with the requirements of 40 CFR Part 63, Subpart G. | |
| | | | HAP Concentration = HAP concentration is greater than or equal to 50 ppm. | |
| | | | By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device. | |
| | | | Flow Rate = Flow rate is greater than or equal to 0.005 scm/min or the owner or operator is not electing to demonstrate this flow rate. | |
| | | | Flow Indicator = By-pass line valve is secured with a car-seal or lock-and-key type configuration. | |
| | | | Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance. | |
| TK-WWTP1 | 40 CFR Part 63, Subpart QQ | 63QQ | Affected Facility = The affected facility is not a surface impoundment for which another subpart of 40 CFR Parts 60, 61, or 63 references the use of 40 CFR Part 63, Subpart QQ for air emission control. | |
| TK-WWTP2 | 40 CFR Part 63, Subpart QQ | 63QQ | Affected Facility = The affected facility is not a surface impoundment for which another subpart of 40 CFR Parts 60, 61, or 63 references the use of 40 CFR Part 63, Subpart QQ for air emission control. | |
| TK-WWTP3 | 40 CFR Part 63, Subpart QQ | 63QQ | Affected Facility = The affected facility is not a surface impoundment for which another subpart of 40 CFR Parts 60, 61, or 63 references the use of 40 CFR Part 63, Subpart QQ for air emission control. | |
| GRPKETTLE | 40 CFR Part 60, Subpart RRR | 60RRR | Chemicals Listed in 40 CFR § 60.707 = The affected facility is not part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate. | |
| PROFORMAL | 40 CFR Part 63, Subpart F | 63F | Applicable Chemicals = The chemical manufacturing process unit manufactures, as a primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii). | |
| | | | Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2. | |
| | | | Alternate Means of Emission Limitation = An alternative means of emission | |

| Unit ID | Regulation | Index Number | Basis of Determination* | Changes and Exceptions to DSS** |
|---------|---------------------------------|--------------|--|---------------------------------|
| | | | limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission. | |
| | | | Heat Exchange System = A heat exchange system is utilized. | |
| | | | Cooling Water Pressure = The heat exchange system is operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. | |
| PRO-OFP | 40 CFR Part 63, Subpart FFFF | 63FFFF | >1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr. | |
| | | | Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less. | |
| | | | Designated Grp1 = The emission stream is not designated as Group 1. | |
| | | | Startup 2003 = The affected source startup was before November 10, 2003. | |
| | | | Determined Grp1 = The emission stream is determined to be Group 2. | |
| | | | Other Operations = The MCPU includes operations other than those listed in § 63.2435(c). | |
| | | | Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63. | |
| | | | 63.100 CMPU = The MCPU is not a CMPU defined in § 63.100. | |
| | | | New Source = The MCPU is a new affected source as described in § 63.2440(c)(1) or (2). | |
| | | | PUG = The MCPU is not part of a process unit group (PUG). | |
| | | | G2/<1000 lb/yr = The process includes Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. | |
| | | | HAP Metals = Uncontrolled emissions from process vents are less than 150 lb/yr of HAP metals. | |
| | | | Startup 2002 = The affected source initial startup was on or after April 4, 2002. | |
| | | | 2525E1 = The MCPU does not meet one of the situations described in paragraph § 63.100(e)(1)(i), (ii) or (iii). | |
| | | | Batch Process Vents = The source includes batch process vents. | |

^{* -} The "unit attributes" or operating conditions that determine what requirements apply ** - Notes changes made to the automated results from the DSS, and a brief explanation why

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

| NSR Permit | Federal Operating Permit(FOP) |
|---|---|
| Issued Prior to new Construction or modification | For initial permit with application shield, can be issued |
| of an existing facility | after operation commences; significant revisions require |
| | approval prior to operation. |
| Authorizes air emissions | Codifies existing applicable requirements, does not |
| | authorize new emissions |
| Ensures issued permits are protective of the | Applicable requirements listed in permit are used by |
| environment and human health by conducting a | the inspectors to ensure proper operation of the site as |
| health effects review and that requirement for | authorized. Ensures that adequate monitoring is in |
| best available control technology (BACT) is | place to allow compliance determination with the FOP. |
| implemented. | |
| Up to two Public notices may be required. | One public notice required. Opportunity for public |
| Opportunity for public comment and contested | comments. No contested case hearings. |
| case hearings for some authorizations. | |
| Applies to all point source emissions in the state. | Applies to all major sources and some non-major |
| | sources identified by the EPA. |
| Applies to facilities: a portion of site or | One or multiple FOPs cover the entire site (consists of |
| individual emission sources | multiple facilities) |
| Permits include terms and conditions under | Permits include terms and conditions that specify the |
| which the applicant must construct and operate | general operational requirements of the site; and also |
| its various equipment and processes on a facility | include codification of all applicable requirements for |
| basis. | emission units at the site. |
| Opportunity for EPA review for Federal | Opportunity for EPA review, Affected states review, and |
| Prevention of Significant Deterioration (PSD) and | a Public petition period for every FOP. |
| Nonattainment (NA) permits for major sources. | |
| Permits have a table listing maximum emission | Permit has an applicable requirements table and |
| limits for pollutants | Periodic Monitoring (PM) / Compliance Assurance |
| | Monitoring (CAM) tables which document applicable |
| | monitoring requirements. |
| Permits can be altered or amended upon | Permits can be revised through several revision |
| application by company. Permits must be issued | processes, which provide for different levels of public |
| before construction or modification of facilities | notice and opportunity to comment. Changes that |
| can begin. | would be significant revisions require that a revised |
| | permit be issued before those changes can be operated. |
| NSR permits are issued independent of FOP | FOP are independent of NSR permits, but contain a list |
| requirements. | of all NSR permits incorporated by reference |

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

 $www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106 list/index 106. html \\$

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

| Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area. | | | |
|--|------------------------------|--|--|
| Authorization No.: 4603 | Issuance Date: 03/24/2017 | | |
| Authorization No.: 97916 | Issuance Date: 09/09/2011 | | |
| Permits By Rule (30 TAC Chapter 106) for the Application Area | | | |
| Number: 106.183 | Version No./Date: 06/18/1997 | | |
| Number: 106.261 | Version No./Date: 11/01/2003 | | |
| Number: 106.262 | Version No./Date: 11/01/2003 | | |
| Number: 106.371 | Version No./Date: 09/04/2000 | | |
| Number: 106.472 | Version No./Date: 03/14/1997 | | |
| Number: 106.472 | Version No./Date: 09/04/2000 | | |
| Number: 106.476 | Version No./Date: 09/04/2000 | | |
| Number: 106.478 | Version No./Date: 03/14/1997 | | |
| Number: 106.511 | Version No./Date: 09/04/2000 | | |
| Number: 8 | Version No./Date: 11/05/1986 | | |
| Number: 51 | Version No./Date: 11/05/1986 | | |
| Number: 91 | Version No./Date: 07/20/1992 | | |

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the

Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR \$ 70.6(a)(3)(i)(B) and 30 TAC \$ 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR \$ 70.6(a)(3)(i)(A) and 30 TAC \$ 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

| Unit/Group/Process Information | | |
|--|-----------------------------------|--|
| ID No.: BOIL-2 | | |
| Control Device ID No.: N/A | Control Device Type: N/A | |
| Applicable Regulatory Requirement | | |
| Name: 30 TAC Chapter 111, Visible Emissions | SOP Index No.: R1111 | |
| Pollutant: OPACITY | Main Standard: § 111.111(a)(1)(A) | |
| Monitoring Information | | |
| Indicator: Visible Emissions | | |
| Minimum Frequency: once per calendar quarter | | |
| Averaging Period: n/a | | |
| Deviation Limit: Maximum Opacity: 30 percent | | |

Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Available Unit Attribute Forms

- OP-UA1 Miscellaneous and Generic Unit Attributes
- OP-UA2 Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 Storage Tank/Vessel Attributes
- OP-UA4 Loading/Unloading Operations Attributes
- OP-UA5 Process Heater/Furnace Attributes
- OP-UA6 Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA7 Flare Attributes
- OP-UA8 Coal Preparation Plant Attributes
- OP-UA9 Nonmetallic Mineral Process Plant Attributes
- OP-UA10 Gas Sweetening/Sulfur Recovery Unit Attributes
- OP-UA11 Stationary Turbine Attributes
- OP-UA12 Fugitive Emission Unit Attributes
- OP-UA13 Industrial Process Cooling Tower Attributes
- OP-UA14 Water Separator Attributes
- OP-UA15 Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 Solvent Degreasing Machine Attributes
- OP-UA17 Distillation Unit Attributes
- OP-UA18 Surface Coating Operations Attributes
- OP-UA19 Wastewater Unit Attributes
- OP-UA20 Asphalt Operations Attributes
- OP-UA21 Grain Elevator Attributes
- OP-UA22 Printing Attributes
- OP-UA24 Wool Fiberglass Insulation Manufacturing Plant Attributes
- OP-UA25 Synthetic Fiber Production Attributes
- OP-UA26 Electroplating and Anodizing Unit Attributes
- OP-UA27 Nitric Acid Manufacturing Attributes
- OP-UA28 Polymer Manufacturing Attributes
- OP-UA29 Glass Manufacturing Unit Attributes
- OP-UA30 Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
- OP-UA31 Lead Smelting Attributes
- OP-UA32 Copper and Zinc Smelting/Brass and Bronze Production Attributes
- OP-UA33 Metallic Mineral Processing Plant Attributes
- OP-UA34 Pharmaceutical Manufacturing
- OP-UA35 Incinerator Attributes
- OP-UA36 Steel Plant Unit Attributes
- OP-UA37 Basic Oxygen Process Furnace Unit Attributes
- OP-UA38 Lead-Acid Battery Manufacturing Plant Attributes
- OP-UA39 Sterilization Source Attributes
- OP-UA40 Ferroalloy Production Facility Attributes
- OP-UA41 Dry Cleaning Facility Attributes
- OP-UA42 Phosphate Fertilizer Manufacturing Attributes
- OP-UA43 Sulfuric Acid Production Attributes
- OP-UA44 Municipal Solid Waste Landfill/Waste Disposal Site Attributes
- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur
- **Recovery Plant Attributes**
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes

- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- OP-UA58 Treatment Process Attributes
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes